

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
V.)	NO. 08-148-LTS
)	
TAREK MEHANNA)	
_____)	

DEFENDANT'S ASSENTED-TO MOTION TO AMEND CONDITIONS OF BAIL

The defendant, Tarek Mehanna, moves that the Court temporarily amend his conditions of bail such that on the evening of July 29, 2009, and into the morning of July 30, 2009, he not receive any telephone calls from the court's automated system. As grounds therefore, the defendant states the following:

1. A criminal complaint was filed against the defendant on November 7, 2008, and the defendant was arrested on November 10, 2008.
2. From November 10, 2008 to December 19, 2008, the defendant was in custody.
3. On December 19, 2008, this Court issued its Order Setting Conditions of Release, and the defendant was released into the custody of his parents.
4. As one condition of release, the defendant was restricted to his parents' and his residence from 8:00

pm to 8:00 am each night.

5. On March 31, 2009, the defendant filed a motion to amend conditions of bail so that his curfew would be changed to midnight to 6 a.m.
6. On April 6, 2009, the court granted the defendant's motion.
7. Since April 6, 2009, the defendant has been receiving multiple phone calls between midnight and 6 a.m. from the court's automated system. As a result, he has been unable to sleep.
8. Pretrial Services Officer Toland Gladden informed the defendant's counsel on or about July 16, 2009, that since his release, the defendant has complied with every condition of release, including his curfew.
9. On July 30, 2009, the defendant is scheduled to take the first of two pharmacy board examinations. This exam is to begin at 8 a.m. and last for six hours.
10. To prepare for this exam, the defendant needs adequate sleep the night before. The automated phone calls from the court prevent that.
11. On July 21, 2009, the defendant's counsel spoke with AUSA Aloke Chakravarty and Toland Gladden, both of whom assented to this temporary amendment of the

conditions of bail.

WHEREFORE, the defendant moves that the Court temporarily amend the conditions of his release such that no automated phone calls be made to him on the evening of July 29 and into the morning of July 30, so that he can get adequate sleep for his pharmacy board exam.

Tarek Mehanna
By His Attorneys

CARNEY & BASSIL

/s/ J. W. Carney, Jr.
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Dated: July 28, 2009

Certificate of Service

I hereby certify that the above document has been served on all parties of record by mail, fax, electronic means, or in hand on or before the above date.

/s/ J. W. Carney, Jr.
J. W. Carney, Jr.